

orano

Columbia Office
7135 Minstrel Way
Columbia, MD 21045
Tel: (410) 910-6900
@Orano_USA

March 12, 2019
E-53756

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

72-1029

Subject: ANUH-01.0150, Standardized Advanced NUHOMS® Updated Final Safety Analysis Report (UFSAR), Revision 9, and 10 CFR 72.48 Summary Report for the Period 8/14/18 to 3/12/19, Docket 72-1029

Reference: Letter from Paul Oleyar to NRC Document Control Desk, "ANUH-01.0150, Standardized Advanced NUHOMS® Updated Final Safety Analysis Report (UFSAR), Revision 8, and 10 CFR 72.48 Summary Report for the Period 8/12/16 to 8/13/18, Docket 72-1029," August 13, 2018 (E-51276)

Pursuant to 10 CFR 72.248, TN Americas LLC (TN) has updated ANUH-01.0150, the Standardized Advanced NUHOMS® UFSAR, last updated by the referenced submittal, and herewith submits UFSAR Revision 9 replacement pages for docketing. This update incorporates conforming changes pursuant to approved Certificate of Compliance No. 1029, Amendment No. 4. There were no changes implemented by TN pursuant to 10 CFR 72.48 since issuance of UFSAR Revision 8.

The changed areas are marked as follows:

- New or changed pages show "Rev. 9" and "03/19" in the header.
- Changed areas are indicated using single revision bars in the right-hand margin.
- Newly inserted text is shown by italics.

I certify that this submittal accurately presents changes made since the referenced submittal.

This submittal includes proprietary information which may not be used for any purpose other than to support NRC staff review of the submittal. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public disclosure.

A053
NM5526
NM55

Accordingly, two versions of replacement pages, Proprietary and Public, are provided, as Enclosures 2 and 3, respectively.

Also, regarding the summary report required to be submitted pursuant to 10 CFR 72.48(d)(2), TN Americas LLC made no changes in facilities or spent fuel storage cask design, no changes in procedures, and no tests or experiments pursuant to (c)(2) of 10 CFR 72.48 during the period 8/14/18 to 3/12/19 for the Standardized Advanced NUHOMS® System.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Douglas Yates at 434-832-3101, or by email at Douglas.Yates@areva.com.



Paul Oleyar
Vice President

cc: Christian Jacobs (NRC SFM) as follows, in a separate mailing:

- One paper copy of this cover letter
- One electronic copy (computer disk) of this entire submittal
- Six electronic copies (computer disk) of the ANUH-01.0150, Standardized Advanced NUHOMS® UFSAR, Revision 9 (Proprietary Version)

List of Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. Replacement Pages for ANUH-01.0150, Standardized Advanced NUHOMS® UFSAR, Revision 9 (Proprietary Version)
3. Replacement Pages for ANUH-01.0150, Standardized Advanced NUHOMS® UFSAR, Revision 9 (Public Version)

**AFFIDAVIT PURSUANT
TO 10 CFR 2.390**

TN Americas LLC)
State of Maryland) SS.
County of Howard)

I, Paul Oleyar, depose and say that I am a Vice President of TN Americas LLC, duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission’s regulations for withholding this information.

The information for which proprietary treatment is sought is contained in Enclosure 2 and is listed below:

- Enclosure 2, Portions of the CoC 1029 updated final safety analysis report (UFSAR) chapters

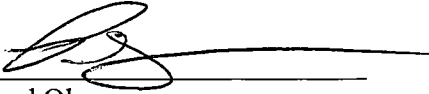
This document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by TN Americas LLC in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission’s regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves portions of the updated final safety analysis report, related to the design of dry spent fuel storage systems, which are owned and have been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN Americas LLC, and not customarily disclosed to the public. TN Americas LLC has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of TN Americas LLC, because the information consists of descriptions of the design of dry spent fuel storage systems, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with TN Americas LLC, take marketing or other actions to improve their product’s position or impair the position of TN Americas LLC’s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.

Further the deponent sayeth not.


Paul Oleyar
Vice President

Subscribed and sworn before me this 12th day of March, 2019.


Notary Public

My Commission Expires 10/16/19

RONDA JONES
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires October 16, 2019